

Message

From: Cohn, Matthew E. [mecohn@arnstein.com]
Sent: 1/28/2016 8:55:04 PM
To: Matson, John [matson.john@epa.gov]
Subject: RE: FOIA Request EPA-R5-2016-002835 Submitted [IWOV-ACTIVE.FID1629687]
Attachments: removed.txt

John:

Since you and I spoke just about an hour ago, I have had discussions with our modeler and with USG.

First, USG has authorized the EPA to spend up to \$2,500 responding to the FOIA request at this point. We are unable to narrow the request further without knowing more precisely what it is that the EPA has that is responsive. After the EPA's air division reviews its files and determines what it has, we could then talk further about narrowing the request if appropriate.

Second, after reviewing the AERMOD files provided by Dan Schaufelberger, our modeler made the comments below.

Overall, the single biggest thing necessary to move forward with any type of review is the documentation/derivation of the emission rates used in the EPA modeling. This may be as simple as 10 cells in a spreadsheet or could be as complex as a series of statistical analyses containing the volumes of emission and production data provided by USG – Red Wing in several spreadsheets.

Unfortunately, we were not provided any of the communication stream from MPCA (modeling input data, preprocessor input files, e-mails, etc.). This would help us understand the EPA's starting point for their evaluation of the data.

In other words, the level of detail provided by EPA is not really sufficient to move forward a meaningful review without assumptions by us. These assumptions would be around EPA's choices on certain aspects of the modeling (e.g., meteorological data processing, receptor locations, different modeling scenarios).

Perhaps you can share these comments with the EPA's modeler, and then the modelers talk directly with each other on the phone prior to the February 10th meeting, either with or without you and me participating. Please let me know.

Regards,

Matthew E Cohn

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From: Matson, John [mailto:matson.john@epa.gov]

Sent: Wednesday, January 27, 2016 3:13 PM

To: Cohn, Matthew E.

Subject: RE: FOIA Request EPA-R5-2016-002835 Submitted [IWOV-ACTIVE.FID1629687]

Matt-

I just tried you again; what time works for you tomorrow morning for a call?

Thanks.

John

From: Cohn, Matthew E. [mailto:mecohn@arnstein.com]

Sent: Wednesday, January 27, 2016 2:19 PM

To: Matson, John <matson.john@epa.gov>

Subject: FW: FOIA Request EPA-R5-2016-002835 Submitted [IWOV-ACTIVE.FID1629687]

John:

I received your phone call about the FOIA request below. You can call me any time this afternoon. My phone number is below. Thank you.

Regards,

Matthew E Cohn

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From: r5foia@epa.gov [mailto:r5foia@epa.gov]

Sent: Saturday, January 16, 2016 2:51 PM

To: Cohn, Matthew E.

Subject: FOIA Request EPA-R5-2016-002835 Submitted

This message is to confirm your request submission to the FOIAonline application: [View Request](#). Request information is as follows:

- Tracking Number: EPA-R5-2016-002835

- Requester Name: Matthew E. Cohn
- Date Submitted: 01/16/2016
- Request Status: Submitted
- Description: Date range for all documents requested below is 2010 to present: 1. All documents, data, reports, and correspondence (including electronic documents and correspondence) concerning air permitting, air emissions, air modeling, enforcement and compliance with the 1 hour SO₂ NAAQS of 75 ppb with respect to the USG Interiors, Inc. plant in Red Wing, Minnesota. 2. All documents, data, reports, and correspondence (including electronic documents and correspondence) concerning the MPCA's implementation of the 1 hour SO₂ NAAQS of 75 ppb. 3. All documents, data, reports, and correspondence (including electronic documents and correspondence) concerning the MPCA's implementation of the Data Requirements Rule for the 1 hour SO₂ NAAQS, 40 CFR Part 51, Subpart BB (51.1200 through 51.1205).